Information Request: BE-6-1

Respondent: Gary R. Babin, Energy

Services and Planning Manager

- Q. With reference to the response to Information Request Exhibit 3, and the September 17, 2001 email from Peter Watt to Gary Babin with the statement "Got your phone message will delete this e mail," please explain in full:
 - (a) The email to be deleted;
 - (b) The content of the phone message to Peter Watt;
 - (c) Why there was a request to delete the email;
 - (d) What was set forth in the email that was deleted; and
 - (e) Why comments regarding the Department of Telecommunications and Energy were not recorded in the minutes of meetings.
- A. (a)(b)(c)(d) Mr. Babin does not recall the content of the deleted email sent five months earlier, the content of the phone message, and to the best of his recollection, does not even remember making a phone call to Mr. Watt on that day.
 - (e) As stated by Mr. Watt in his September 17 email to Mr. Babin: "FYI We are not recording any comments regarding the Department of Telecommunications and Energy in our meeting minutes as we are NOT in that loop." The meeting was called by Shooshanian Engineering and to the best of WMLP's knowledge, only Shooshanian Engineering personnel recorded meeting minutes.

Information Request: BE-6-2

Respondent: Richard F. Joyce, Director

Date: March 6, 2002

Q. With regard to the response to Information Request Exhibit 3, and the chart entitled "HIGH VOLTAGE SCHEDULE" dated July 20, 2001, please indicate whether this schedule is still accurate and in force. If not, please provide a new schedule reflecting the installation of permanent facilities.

A. This schedule was not prepared by WMLP and WMLP is not responsible for its contents. WMLP is not aware of a revised schedule.

Information Request: BE-6-3

Respondent: Gary R. Babin, Energy

Services and Planning Manager

- Q. With regard to the response to Information Request Exhibit 2 and the October 8, 1999 letter from Gary Babin to David Peduto containing the statement that "the Olin Foundation has verbally indicated that they wish to secure their electric supply from WMLP through the Babson College switchgear," please indicate who made the verbal commitment and to whom. Please provide the names of all Olin, Babson and WMLP personnel involved in making or receiving the above-referenced verbal commitment.
- A. There is no letter to David Peduto dated October 8, 1999. WMLP believes BECo's reference may be to correspondence dated October 18, 1999. Mr. Babin's recollection is that Mr. Peduto expressed this intention during a meeting between Mr. Peduto and Mr. Babin.

Information Request: BE-6-4

Respondent: Donald H. Newell, Electric

Superintendent

Date: March 6, 2002

- Q. Please describe and provide a copy of any easements or other land use rights of any kind WMLP has or plans to have from Olin and/or Babson for the placement of electric facilities.
- A. At this time, two alternative routes are being evaluated for permanent service to Olin College. These two alternatives are:
 - ?? Providing electric service to both Babson College and Olin College through a single lineup of switchgear to be located on the Babson campus, at a location in Wellesley through which WMLP has served for decades. Both Babson College and Olin College would be separately metered customers of WMLP under this arrangement. As we understand, Olin College will have ownership interests in the switchgear, electric lines out of the switchgear, with the associated land rights.
 - ?? Providing electric service to Olin College through switchgear to be located on a piece of land owned by Olin College in Wellesley.

It appears at this time that serving both loads through a single lineup of switchgear located on the Babson Campus is the preferred alternative.

Once it is determined which supply alternative best suits the meds of the respective institutions, the final easement and other land use rights which WMLP may require to fulfill this alternative will be established and legally executed.

Information Request: BE-6-5

Respondent: Gary R. Babin, Energy

Services and Planning Manager

- Q. Regarding any meetings held between any combination of Babson, Olin and WMLP since January 1, 2002, please describe when such meetings have been held, and specify the attendees and provide the agendas of any such meetings. Also, provide the minutes of all such meetings or, if no minutes are available, a summary of the topics discussed. Also include any materials distributed or referenced at such meetings.
- A. The meetings held since January 1, 2002 between Babson, Olin and WMLP with attendees listed and location held are detailed on the first page of WMLP's Information Request Exhibit 3. The minutes of the first meeting, held January 7, 2002, are attached as the last item in said Exhibit 3. The second meeting, held January 22, 2002, was informal in nature and no meeting minutes were recorded. The topics discussed were primarily related to the existing Babson College switchgear and fuse coordination issues associated with the Olin College load.

Franklin W. Olin College of Engineering

D.T.E. 01-95

Information Request: BE-6-6

Respondent: Richard F. Joyce, Director

Date: March 6, 2002

Q. With reference to Attachment BE-1-8A, there is an electricity cost analysis dated October 27, 2000, which is an update to an original analysis dated November 19, 1999, conducted by LaCapra Associates. In this 2000 analysis, please explain what is being updated. Also, please explain the Power Options alternative and whether the Power Options alternative would be available if Olin took service from: (a) Boston Edison; or (b) WMLP. Please provide a copy of all documentation relating to the Power Options alternative.

A.

Any documentation that the WMLP would have relative to an electricity rate analysis and comparison was provided to BECo in WMLP's response to BE-4-8. If WMLP understands this BECO information request, WMLP did not prepare the analysis referenced in this question and was not aware of it until it read the discovery responses.

Information Request: BE-6-7

Respondent: Donald H. Newell, Electric

Superintendent

- Q. With reference to Attachment BE-1-5B, under Note 3 there is the following statement: "All electrical power ductbanks and manholes shall be built to [Wellesley Municipal Light Plant ("WMLP")] standards." Please provide a copy of all WMLP standards for ductbanks, switchgear and electrical interconnection.
- A. WMLP does not have a formalized set of standard drawings for ductbanks, switchgear and electrical interconnection. Each project is individually designed, reviewed and approved by WMLP staff. After discussion of general requirements with Shooshanian Engineering, WMLP agreed to allow them to provide specifications for WMLP's review and approval.